IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

| UNITED STATES OF AMERICA, | |
|--------------------------------------|-------------------------|
| Plaintiff, | CIVIL NO. 12-2039 (GAG) |
| V. | |
| COMMONWEALTH OF PUERTO RICO, et al., | |

MOTION SUBMITTING BI-ANNUAL STATUS REPORT PURSUANT TO PARAGRAPH 261 AND MOTION FOR LEAVE TO FILE SPANISH LANGUAGE DOCUMENTS

TO THE HONORABLE COURT:

Defendants.

COMES NOW Defendants, Commonwealth of Puerto Rico and Puerto Rico Police Department ("Defendants" and/or "PRPB"), by and through the undersigned counsel, and respectfully inform the Court as follows:

- 1. Pursuant to Paragraph 261 of the Agreement for the Sustainable Reform of the Puerto Rico Police Department, after the Technical Compliance Advisor ("TCA") files his first six-month report, the PRPB is to file a bi-annual status report (the "Status Report") "no later than 15 days before the end of the period under review." Docket No. 57, ¶261.
- In compliance with the provisions of the Agreement, the PRPB hereby submits its
 first bi-annual Status Report of 2019, which is due today, as Exhibit 1 to the instant
 motion.
- 3. Moreover, the PRPB's Status Report incorporates by reference five exhibits, all in the Spanish language.

Accordingly, the PRPB hereby requests leave to file the aforementioned exhibits
in the Spanish language, and also requests that the Court provide the PRPB thirty
(30) days to file translated versions of the exhibits to the Status Report.

WHEREFORE, Defendants respectfully request the Court to take NOTICE of the above submission and GRANT the PRPB's motion as requested.

RESPECTFULLY SUBMITTED.

WE HEREBY CERTIFY: That today we have electronically filed the foregoing document with the Clerk of the Court for the District of Puerto Rico, using the CM/ECF system which will send a copy and notification of filing to all counsel of record.

In San Juan, Puerto Rico, this 25th day of March, 2019.

By:

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